

83
9/6/01

IN THE UNITED STATES DISTRICT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

BEVERLY BEAM

Plaintiff

vs.

SCOTT DOWNEY, ROGER
MORRISON, DAVID
GRAYBILL AND MICHAEL
SWEGER

Defendants

CIVIL ACTION LAW

83
1:CV-01-0600

J McKeene

FILED
HARRISBURG

SEP 05 2001

MARY E. D'ANDREA, CLERK
Per AK
DEPUTY CLERK

JURY TRIAL DEMANDED

PLAINTIFF'S MOTION FOR ENLARGEMENT OF TIME

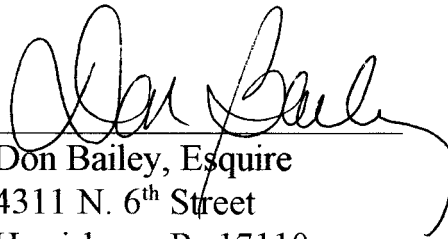
1.) On or about November 1, 2001 discovery ends in the above captioned matter.

2.) Plaintiff's counsel has been unable to depose the defendants as of this date and has only been able to schedule the deposition of Roger Morrison at the end of October 2001 because of defendants scheduling problems. Plaintiff has to conclude the depositions of the defendants and we have additional witnesses that also need to be deposed.

3.) Opposing counsel was notified and P. Daniel Altland, Esquire and Steven Schiffman Esq. do concur in this motion. Steven Russell was notified but counsel was unable to elicit a response from him.

WHEREFORE the plaintiff is requesting a 120-day enlargement of time of the discovery period until March 1, 2001 and to advance the case management plan accordingly.

Respectfully Submitted,

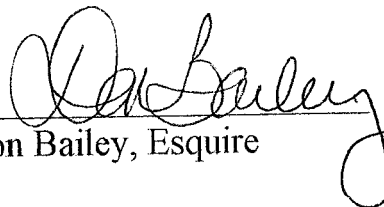
A handwritten signature in blue ink, appearing to read "Don Bailey", is written over a horizontal line.

Don Bailey, Esquire
4311 N. 6th Street
Harrisburg, Pa 17110
(717) 221-9500

September 3, 2001

CERTIFICATE OF CONCURRENCE/NON CONCURRENCE

I, Don Bailey contacted all counsel regarding the concurrence or non-concurrence of the Motion for Enlargement of Time. P. Daniel Altland Esq., and Steven Schiffman Esq., do concur. I was unable to reach Stephen Russell Esq., for his concurrence.


Don Bailey, Esquire

CERTIFICATE OF SERVICE

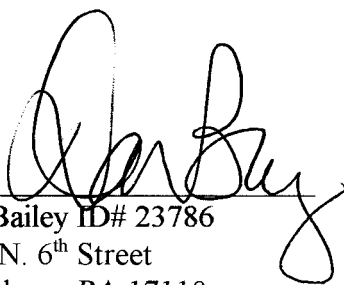
I hereby certify that on this **September 3, 2001** true and correct copy of the foregoing
MOTION FOR ENLARGEMENT OF TIME was served upon the following counsel of record

by United States Mail, postage prepaid:

Stephen Russell, Esquire
Stock and Leader
35 S. Duke Street
P.O. Box 5167
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Steven Schiffman, Esquire
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